

1 Jeffrey C. Block, *pro hac vice*
2 Jacob A. Walker (SBN 271217)
3 **Block & Leviton LLP**
4 260 Franklin Street, Suite 1860
5 Boston, MA 02110
6 (617) 398-5600 phone
7 jeff@blockleviton.com
8 jake@blockleviton.com

6 *Attorneys for Lead Plaintiff*
7 *Rick Keiner and the Class*

8 *Additional Counsel on Signature Page*

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 In re LYFT INC. SECURITIES LITIGATION

13 This Document Relates to:
14 ALL ACTIONS
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Vincent Cheng (SBN 230827)
Block & Leviton LLP
100 Pine Street, Suite 1250
San Francisco, CA 94111
(510) 543-0489 phone
vincent@blockleviton.com

MASTER FILE NO. 4:19-CV-02690-HSG

**JOINT STIPULATION TO AMEND
EXHIBIT A-1 TO LEAD PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

1 Pursuant to Civil Local Rule 7-12, Lead Plaintiff Rick Keiner (“Lead Plaintiff”) and
2 Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant (Sean) Aggarwal,
3 Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes
4 Wilderotter (“Defendants,” and together with Lead Plaintiff the “Parties”), through their counsel,
5 submit the following Joint Stipulation to Amend Exhibit A-1 to Lead Plaintiff’s Motion for
6 Preliminary Approval of Class Action Settlement.

7 WHEREAS, on June 16, 2022, Lead Plaintiff filed his Notice of Motion, Unopposed
8 Motion for Preliminary Approval of Settlement, and Memorandum of Points and Authorities in
9 Support Thereof (the “Motion for Preliminary Approval”) (ECF No. 249);

10 WHEREAS, the Motion for Preliminary Approval included Exhibit A-1, a proposed
11 Notice of (I) Pendency of Proposed Settlement; (II) Motion for an Award of Attorneys’ Fees and
12 Reimbursement of Litigation Expenses; and (III) Settlement Hearing (the “Settlement Notice”)
13 (ECF No. 249-4);

14 WHEREAS, on September 15, 2022, the Court held a hearing on the Motion for
15 Preliminary Approval;

16 WHEREAS, on September 27, 2022, Lead Plaintiff filed an amended version of the
17 Settlement Notice (ECF Nos. 276-5, 275-6);

18 WHEREAS, on November 17, 2022, the Court held a second hearing on the Motion for
19 Preliminary Approval and suggested certain additional changes to the paragraph in the
20 Settlement Notice referencing a related case in California Superior Court captioned *In re Lyft,*
21 *Inc. Securities Litigation*, Case No. CGC-19-575293 (the “State Action”);

22 WHEREAS, the Parties met and conferred on November 17, 2022, following the hearing,
23 and agreed to amend the Settlement Notice;

24 WHEREAS, attached hereto as Exhibit A-1 is the second amended Settlement Notice;

25 WHEREAS, attached hereto as Exhibit A-1(a) is the second amended Settlement Notice,
26 with changes shown in redline;

27 NOW, THEREFORE, the Parties hereby stipulate that the Settlement Notice be amended,
28

as reflected in the attached Exhibits A-1 and A-1(a).

Stipulated and agreed to by:

Date: November 22, 2022

BLOCK & LEVITON LLP

/s/ Jeffrey C. Block

Jeffrey C. Block (*Pro Hac Vice*)

Jacob A. Walker (CA Bar. No. 271217)

260 Franklin Street, Suite 1860

Boston, MA 02110

jeff@blockleviton.com

jake@blockleviton.com

Counsel for Lead Plaintiff and the Class

LATHAM & WATKINS LLP

/s/ Colleen C. Smith

Colleen C. Smith (CA Bar. No. 231216)

12670 High Bluff Drive

San Diego, CA 92130

Colleen.Smith@lw.com

Matthew Rawlinson (CA Bar. No. 231890)

140 Scott Drive

Menlo Park, CA 94025

T: (650) 328-4600 / F: (650) 463-2600

matthew.rawlinson@lw.com

Elizabeth Deeley (CA Bar. No. 230798)

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

T: (415) 391-0600 / F: (415) 395-8095

elizabeth.deeley@lw.com

Andrew B. Clubok (*pro hac vice*)

Susan E. Engel (*pro hac vice*)

555 Eleventh Street, NW, Suite 1000

Washington, D.C. 20004

T: (202) 637-2200 / F: (202) 637-2201

andrew.clubok@lw.com

susan.engel@lw.com

Counsel for Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant Aggarwal, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter

FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: November 22, 2022

/s/ Jeffrey C. Block
Jeffrey C. Block

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